

Original DNR Proposal

AGP proposes Agency Operation & Maintenance Plans that meet the minimum requirements of CAM (i.e. appropriate indicators, indicator ranges, measurement approach etc.). These O&M plans are incorporated into the Title V permit in the monitoring section. The permit writer notes state that the potential uncontrolled emissions from the source are greater than major source thresholds; therefore CAM does apply to the sources. The notes will also state that the Agency O&M plans proposed by the facility meet the requirements of CAM so additional CAM plans are not required.

Facility Response

The permit writer notes will state that the potential uncontrolled emissions (prior to the associated bag filters) from the source are greater than major source thresholds; however, AGP has provided information to document that these bagfilters meet the definition of 'inherent process equipment', therefore CAM does apply to the sources.

Nevertheless, AGP will propose Agency Operation & Maintenance Plans that meet the minimum requirements of CAM (i.e. appropriate indicators, indicator ranges, measurement approach etc.). These O&M plans will be incorporated into the Title V permit in the monitoring section. The permit writer notes will also state that the Agency O&M plans proposed by the facility meet the requirements of CAM, even though CAM plans are not required.

DNR Draft Response

The permit writer notes will state that the potential uncontrolled emissions (prior to the associated bag filters) from the source are greater than major source thresholds.

AGP will propose Agency Operation & Maintenance Plans that meet the minimum requirements of CAM (i.e. appropriate indicators, indicator ranges, measurement approach etc.). These O&M plans will be incorporated into the Title V permit in the monitoring section. The permit writer notes will state that the Agency O&M plans proposed by the facility meet the requirements of CAM.